

121525

January 30, 2001

National Highway Traffic Safety Administration
Docket Management
Room PL-401
400 Seventh Street, S.W.
Washington, DC 20590

Re: Docket No. NHTSA-00-8296 - 13

To Whom It May Concern:

On December 1, 2000, NHTSA published an Advance Notice of Proposed Rulemaking (ANPRM) regarding certification; federal motor vehicle safety standards; tire identification and recordkeeping; and consumer information regulations. The Tire Association of North America (TANA) is submitting comments on the ANPRM on behalf of our members.

TANA is an 80-year-old trade association that represents approximately 4,000 independent tire dealers – and the tire dealer industry at large – in North America. TANA members are primarily small businesses that sell, service and install new, used and retreaded tires on all vehicles, from passenger cars to heavy equipment and trucks. Many tire dealers also perform automotive service and repair work.

The recent Firestone tire recall has placed a spotlight on our industry. While there have been some terrible tragedies, TANA believes that the public is now more aware of the importance of tire safety and maintenance. TANA has conducted a nationwide public awareness campaign about tire maintenance by creating a poster for all of our members to post in their businesses, among other means. The poster contains the basics for proper tire maintenance: 1) Check the air pressure; 2) Check for premature or uneven wear; 3) Check for proper tire

DEPT. OF TRANSPORTATION
DOCKETS

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alignment; 4) Rotate your tires regularly; and 5) Don't overload your vehicle. (A copy of TANA's poster is attached.)

In response to NHTSA's request for information, we surveyed TANA members, asking questions related to the ANPRM. A copy of the survey and its results is attached.

Our comments address only those questions posed in the ANPRM that our dealers have the ability to answer.

Question 1: Are consumers being given the information they need to maintain their tires properly, to determine how much weight (passengers plus cargo) they can safely place in their vehicles, and to identify tires that have been determined to be defective or noncompliant? What tire information is most important for consumers to have for safety and recall purposes?

According to TANA members surveyed, the average consumer generally is not well educated when it comes to his/her tires. Fifteen percent of our dealers believe that consumers are generally well educated, 42 percent said somewhat educated, and 43 percent said not well educated. Our survey indicated that customers generally rely on their tire dealers for information regarding tire safety, maintenance and choosing the right tires for their vehicle.

There is a wealth of information that exists on tires. Anecdotal evidence from our tire dealers suggests that the average consumer chooses to ignore this information. Customers often do not understand the labels on tires and confuse maximum psi with recommended psi. Even then, consumers often have their own beliefs as to why they should over-or under-inflate their tires.

A well-informed consumer will read their vehicle's owner's manual and ask questions of their tire dealer to receive the information and education they need. Tire manufacturers, industry trade associations, and the media have done their part to get the information out to the public on

tire safety. It is now up to consumers to listen and follow the advice given to them by the experts.

To be fully informed about safety issues or recalls, a consumer needs to complete a tire registration form. Tire dealers provide these forms at the time of purchase. It is a requirement that dealers provide these forms with the serial numbers for all tires purchased, the tire brand, and the dealer's name and address. Not providing registration forms to customers could result in dealer fines of \$1,000 per tire, up to \$200,000 in penalties. Manufacturers provide the cards to dealers. Customers are responsible for filling out their personal information and, if they return their cards, will be directly notified in the event of a recall.

Question 14: Do consumers understand and effectively use the load index values that are now provided on some tires? When purchasing replacement tires, do consumers typically refer to the maximum load rating and/or the load index for their vehicle? Do they sometimes replace extra load capacity tires with standard capacity tires? Please provide data to support your responses to this question.

Again, TANA members were asked, "Are your customers generally well-informed about the labeling on their tires (load index values, maximum psi, etc.)?" The results of the survey did not surprise us. Fifteen percent said most people are well informed, 42 percent said somewhat informed, and 43 percent said customers are not well informed. Consumers tend to rely on their tire dealer to select tires for their vehicles that will meet all of the manufacturer's recommendations. A reputable tire dealer would not permit a consumer to purchase tires that are not appropriate for their vehicle.

Question 15: What assistance do tire retailers provide consumers in selecting a tire with the correct load rating or load index for their vehicle? Is this assistance provided to all customers or only to those customers who ask about the rating index? How much information do the retailers provide to ensure that a consumer chooses a tire that is right for his or her vehicle? Do the retailers routinely check the certification label information for gross vehicle weight rating (GVWR) or gross axle weight rating (GWAR) to ensure that the load capacity of the tires selected by the purchaser exceeds the GWAR/GVWR of the vehicle?

Ninety-eight percent of TANA dealers said that customers rely on them for all information on tire safety and maintenance. About half of all dealers give all of their customers tire information without being asked, and the other half educate customers as is requested by the customers.

Tire dealers educate consumers on a variety of tire topics: tire sizes, proper tire inflation, proper tire maintenance, load ratings and indexes, and speed ratings.

Tire dealers do not routinely check to see that the tires purchased are correct for the gross vehicle weight rating (GVWR) and gross axel weight rating (GAWR). In our survey, 75 percent said they check for GVWR or GAWR as necessary. This issue arises when the dealer is replacing original tires with a similar tire. It would be a red flag to a dealer if a consumer wanted to change a tire to a lower load capacity tire that could not handle the GVWR or GAWR of the vehicle.

Question 22: The speed rating of a tire is generally indicated on the tire although not required by either FMVSS Nos. 109 and 119. Should steps be taken to increase the likelihood that consumers purchase replacement tires with a speed rating specified by the vehicle

manufacturer? If so, what steps should be taken and why? Do tire retailers routinely assist consumers to ensure that the selected tires have the correct speed rating for their vehicles?

The speed rating of a tire indicates the range of speeds at which a tire can carry a load under specified conditions. Having the vehicle manufacturer specify the speed rating on a tire is unnecessary. If a customer wants a higher speed-rated tire, it is for better handling of their vehicle. It should be the consumer's choice as long as that choice is not an unsafe one.

Tire dealers typically replace a tire with a new tire of the same speed rating unless otherwise requested by the consumer. If a customer wants to decrease their speed rating, most dealers will recommend only going down one speed level, as the difference in handling a vehicle changes noticeably (slows down or seems sluggish) if decreased more than one level. If a customer wants to purchase a higher speed-rated tire, dealers are split as to how many levels the consumer should go up. 27.5 percent believe a consumer should only go up one level at a time, 26.5 percent say up to two levels, and 46 percent would go three levels or higher. Increasing a tire's speed rating will make the car more sensitive to the road and handling needs. This should be the consumer's choice.

Question 24: What changes, if any, should be made in the labeling requirements applicable to retreaded tires? Please provide the basis for your response.

The majority of TANA members do not deal with retreaded tires. However, we posed two questions on our survey to get feedback. The first question was, "Should retreads be subject to the same labeling requirements as original tires?" Our members responded 72 percent yes, and 28 percent no. The second survey question asked, "Do you believe any changes should be made to the current labeling requirements for retreaded tires?" Only nine percent of respondents

said yes. The reasons given for yes varied widely. Thus, we cannot recommend any reason to change the labeling requirements for retreaded tires.

Retreaded tires are already labeled similarly to original tires with the exception of an "R" after the letters "DOT" and before the code. The average consumer would probably not know this and should be informed they are purchasing a retreaded tire at the time of sale.

Question 25: With respect to passenger cars, a placard containing the vehicle manufacturer's recommended cold tire inflation pressure is required by FMVSS N. 110 to be affixed to the glove compartment door or an equally accessible location, e.g., the driver's door pillar. With respect to motor vehicles other than passenger cars, similar information is required by FMVSS No. 120 to appear on the vehicle certification label or on the tire information label. What other pertinent tire information (e.g., tire size and speed rating) should be considered for the placards or the labels? What other locations, such as the inside of the fuel tank access door, should be considered to ensure that the tire information contained on the placard and the labels is conspicuous to vehicle users and why? The fuel tank access door is regularly seen by drivers who fill their own fuel tanks and at such times when an air pump is generally available nearby. Please provide the basis for your responses.

TANA's survey asked dealers where they thought would be a good location to put tire inflation information. The visor came in at 43 percent, 14 percent said the dashboard, 14 percent said the gas cap (fuel tank access door), 13 percent said the glove box, and 33 percent said the doorjamb. We also received numerous suggestions for a sticker in the upper left-hand corner of the windshield, much like the oil change reminder stickers frequently utilized.

One concern and suggestion some of our dealers had was to not put the information in a place that can be seen every day. If it becomes commonplace, people may unwittingly choose to ignore it.

TANA's concern with placing the information on the fuel tank access door is that a tire's pressure is supposed to be checked when the tire is cold (having not been driven on in at least four hours). If a consumer is at the gas station, they have driven to get there. Unless they have driven less than ½ mile, their tires have heated up to varying degrees and will not give an accurate pressure reading.

TANA believes that a tire pressure warning system mandated by NHTSA would be the most effective tool in keeping consumers informed and aware of proper tire maintenance. An individual would pay more attention to a sudden warning light than a sticker placed anywhere in or on the vehicle that they routinely see.

Question 27: What type of tire safety information should be provided? Where and how should it be presented so that it is readily noticed and easily understood?

Again, TANA has sent out posters to all of its dealer members to display in their stores. We also are supporting the Rubber Manufacturers Association's efforts to publicize their "PART" program, which focuses on proper Pressure, Alignment, Rotation and Tread. Manufacturers, industry trade associations, and the media have done their part to educate consumers. Consumers need to take the time to notice and read the wide array of information that now exists.

Question 28: Paragraph S5.1.1 of FMVSS No. 120 specifies that each motor vehicle shall be equipped with tires that meet the requirements of FMVSS No. 109 or 119. What are the

merits of including or excluding trailer tires, motorcycle tires, etc. from any amendments to the tire information labeling requirements that may be proposed and adopted in this rulemaking?

Please be specific in your response and provide a basis for your answer.

TANA's survey asked our dealers if motorcycle and trailer tires should be subject to the same labeling requirements as passenger, light truck, or truck tires. The majority, 77 percent, said yes and 23 percent said no. Consumers are confused enough about labels found on tires. If all tires are required to follow the same labeling standards, it will be easier for consumers to understand the information on all tires.

If you have any questions about the comments submitted by TANA, please contact Becky MacDicken at 703/736-8082. We look forward to working with you on these issues in the future.

AVAILABILITY OF NON-SCANNABLE ITEMS

NK TSA-00-8296

Docket / Document Number

Old Docket Number, If any

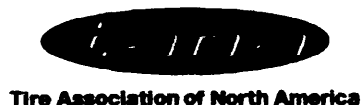
poster

Name / Description of Item(s) non-scannable

MAY BE VIEWED IN NHTSA/Docket Office
5111/Carolyn Greene

Agency / Office Name / Room Number / Contact Person (if any)

during the hours of 9:30-4:00pm



STOP!

**The Tire Association of North America (TANA) needs your help.
Please take two minutes and fill out this survey.**

Dear TANA Member:

The National Highway Traffic and Safety Administration (NHTSA) is creating new rules for the tire industry as a result of the tire industry legislation passed by Congress in October. NHTSA has solicited certain information, and TANA has offered to provide it. We want your input.

- (1) **Are your customers generally well-informed about the labeling on their tires (load index values, maximum psi, etc.)?**

☐ Yes

☐ Somewhat

☐ No

- (2) **Do your customers generally rely on you (and your employees) for tire safety and maintenance information?**

☐ Yes

☐ No

- (3) **What tire safety information does your business provide to customers?
(Check all that apply)**

☐ Difference in tire sizes

☐ Proper tire inflation levels (psi) -- recommended vs. maximum inflation

☐ Proper tire maintenance (checking pressure once a month, rotation, etc.)

☐ Proper load ratings/indexes for car/needs

☐ Speed ratings

☐ Other _____

- (4) **Is tire safety information (either verbal or written) provided to all of your customers?**

☐ Yes, all customers receive tire safety information.

☐ Only to customers who request the information

☐ No, none of my customers receive tire safety information.

- (5) Do you have your customers initial a statement that they have received instruction on proper tire maintenance?
- ☐ Yes ☐ No
- (6) When changing a tire, do your technicians check for the correct gross vehicle weight rating (GVWR) and gross axle weight rating (GAWR)?
- ☐ Yes, always ☐ Only as needed ☐ Never
- (7) When replacing a tire, do your technicians match the tire's speed rating to the other tires on the car?
- ☐ Yes ☐ Sometimes ☐ No
- (8) If a customer wants to increase the speed rating of all of their tires, what is the maximum speed rating increase that you will permit?
- ☐ Up one level ☐ Up two levels ☐ Up three levels
- (9) If a customer wants to decrease the speed rating of all of their tires, what is the maximum speed rating decrease that you will permit?
- ☐ Down one level ☐ Down two levels ☐ Down three levels
- (10) If a customer wants to change the speed rating level of a single tire, do you suggest that four new tires be purchased?
- ☐ Yes ☐ No
- (11) If a customer buys two new tires, do you mount the new tires on the same axel?
- ☐ Yes ☐ Sometimes ☐ No
- (12) Should tire inflation labels be placed inside motor vehicles as a reminder to check air pressure?
- ☐ Yes ☐ No

(13) If yes, where should tire inflation labels be placed? (Check all that apply)

- ☐ Visor ☐ Dashboard ☐ Gas Cap ☐ Glove box
☐ Door jamb ☐ Other _____

(14) Will tire pressure monitoring systems help consumers maintain proper air pressure in their tires?

- ☐ Yes ☐ No

(15) Should motorcycle and trailer tires be subject to the same labeling requirements as passenger, light truck, or truck tires?

- ☐ Yes ☐ No

(16) Should retreads be subject to the same labeling requirements as original tires?

- ☐ Yes ☐ No

(17) Do you believe any changes should be made to the current labeling requirements for retreaded tires?

- ☐ Yes ☐ Don't Know ☐ No

If "yes," please explain _____

**Please FAX this completed survey by Friday,
January 12, 2001
to TANA at (703) 904-4339.**



Tire Association of North America

Survey Results

- (1) Are your customers generally well-informed about the labeling on their tires (load index values, maximum psi, etc.)?

<input type="checkbox"/> Yes	15%
<input type="checkbox"/> Somewhat	42%
<input type="checkbox"/> No	43%

- (2) Do your customers generally rely on you (and your employees) for tire safety and maintenance information?

<input type="checkbox"/> Yes	98%
<input type="checkbox"/> No	2%

- (3) What tire safety information does your business provide to customers?
(Check all that apply)

<input type="checkbox"/> Difference in tire sizes	91%
<input type="checkbox"/> Proper tire inflation levels (psi) -- recommended vs. maximum inflation	99%
<input type="checkbox"/> Proper tire maintenance (checking pressure once a month, rotation, etc.)	95%
<input type="checkbox"/> Proper load ratings/indexes for car/needs	76%
<input type="checkbox"/> Speed ratings	85%
<input type="checkbox"/> Other _____	14%

- (4) Is tire safety information (either verbal or written) provided to all of your customers?

<input type="checkbox"/> Yes, all customers receive tire safety information.	49%
<input type="checkbox"/> Only to customers who request the information	49%
<input type="checkbox"/> No, none of my customers receive tire safety information.	2%

- (5) Do you have your customers initial a statement that they have received instruction on proper tire maintenance?
- | | |
|------------------------------|-----|
| <input type="checkbox"/> Yes | 3% |
| <input type="checkbox"/> No | 97% |
- (6) When changing a tire, do your technicians check for the correct gross vehicle weight rating (GVWR) and gross axle weight rating (GAWR)?
- | | |
|---|-----|
| <input type="checkbox"/> Yes, always | 15% |
| <input type="checkbox"/> Only as needed | 75% |
| <input type="checkbox"/> Never | 10% |
- (7) When replacing a tire, do your technicians match the tire's speed rating to the other tires on the car?
- | | |
|------------------------------------|-------|
| <input type="checkbox"/> Yes | 71% |
| <input type="checkbox"/> Sometimes | 26.5% |
| <input type="checkbox"/> No | 2.5% |
- (8) If a customer wants to increase the speed rating of all of their tires, what is the maximum speed rating increase that you will permit?
- | | |
|--|-------|
| <input type="checkbox"/> Up one level | 27.5% |
| <input type="checkbox"/> Up two levels | 26.5% |
| <input type="checkbox"/> Up three levels | 46% |
- (9) If a customer wants to decrease the speed rating of all of their tires, what is the maximum speed rating decrease that you will permit?
- | | |
|--|-----|
| <input type="checkbox"/> Down one level | 79% |
| <input type="checkbox"/> Down two levels | 12% |
| <input type="checkbox"/> Down three levels | 9% |
- (10) If a customer wants to change the speed rating level of a single tire, do you suggest that four new tires be purchased?
- | | |
|------------------------------|-----|
| <input type="checkbox"/> Yes | 88% |
| <input type="checkbox"/> No | 12% |
- (11) If a customer buys two new tires, do you mount the new tires on the same axel?
- | | |
|------------------------------------|------|
| <input type="checkbox"/> Yes | 92% |
| <input type="checkbox"/> Sometimes | 7.5% |
| <input type="checkbox"/> No | .5% |

(12) Should tire inflation labels be placed inside motor vehicles as a reminder to check air pressure?

<input type="checkbox"/> Yes	90%
<input type="checkbox"/> No	10%

(13) If yes, where should tire inflation labels be placed? (Check all that apply)

<input type="checkbox"/> Visor	43%
<input type="checkbox"/> Dashboard	14%
<input type="checkbox"/> Gas Cap	14%
<input type="checkbox"/> Glove box	13%
<input type="checkbox"/> Door jamb	33%
<input type="checkbox"/> Other	12%

(14) Will tire pressure monitoring systems help consumers maintain proper air pressure in their tires?

<input type="checkbox"/> Yes	80.5%
<input type="checkbox"/> No	19.5%

(15) Should motorcycle and trailer tires be subject to the same labeling requirements as passenger, light truck, or truck tires?

<input type="checkbox"/> Yes	77%
<input type="checkbox"/> No	23%

(16) Should retreads be subject to the same labeling requirements as original tires?

<input type="checkbox"/> Yes	72%
<input type="checkbox"/> No	23%

(17) Do you believe any changes should be made to the current labeling requirements for retreaded tires?

<input type="checkbox"/> Yes	9%
<input type="checkbox"/> Don't Know	61%
<input type="checkbox"/> No	30%

Based on 338 responses.